

1. This motion requests an order from the Bankruptcy Court authorizing the person filing this motion to foreclose on or to repossess the property that is identified in paragraph 3.

2. Mtwarra: Ally Bank

3. Movant, directly or as agent for the holder, holds a security interest in 2020 Chevrolet Tahoe Utility 4D LT 4WD 5.3L V8, VIN # 1GNSKBKCLR288493.

4. Movant has reviewed the schedules filed in this case. The property described in paragraph 3 is claimed as exempt by the debtor. Movant does not contest the claimed exemption.

5. Type of collateral (e.g., Home, Manufactured Home, Car, Truck, Motorcycle): Automobile.

6. Debtor's scheduled value of property: N/A.

7. Movant's estimated value of property: \$47,425.00.

8. Total amount owed to movant: \$51,668.54.

9. Estimated equity (paragraph 7 minus paragraph 8): \$

10. Total pre and post-petition arrearages: \$20,843.44.

11. Total post-petition arrearages: \$17,031.07.

12. _____ Amount of unpaid, past due property taxes, if applicable: \$ _____

13. Expiration date on insurance policy, if applicable: _____

14. ✓ Movant seeks relief based on the debtor(s)' failure to make payments. Debtor(s)' payment history is attached as exhibit "D." Movant represents that the attached payment history is a current payment history reflecting all payments, advances, charges and credits from the beginning of the loan. Movant further represents that the payment history is self-explanatory or can be interpreted by application of coding information that is also attached. Movant acknowledges that the Court may prohibit the use of parole evidence to interpret a payment history that does not satisfy these representations.

15. ✓ . Movant seeks relief based on the debtor(s)' failure to provide a certificate of insurance reflecting insurance coverage as required under the debtor's pre-petition contracts.

16. If applicable: Name of Co-Debtor: _____

17, Based on the foregoing, movant seeks termination of the automatic stay [and the co-debtor stay, if applicable] to allow movant to foreclose or repossess the debtor(s)' property and seeks to recover its costs and attorneys' fees in an amount not to exceed the amount listed in paragraph 9.

I& Movant certifies-that prior to. Ming- this motion an attempt was Made" to confer with the- Debturtel cuonst.4 (or with Debtor(s), if *pro se*) either by telephone, by e-mail or by facsimile, by the following person on the following date and time: April 25, 2023 via email to Raymond William Battaglia, and via telephone to Kyung Shik Lee.

_____. An agreement could not be reached. If requested by debtor or debtor's counsel, a payment history in the form attached to this motion was provided at least two days, excluding intermediate weekends and holidays, before this motion was filed.

Sgt Patrick M. Lynch

Movant's counsel signature

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Certificate of Service

I certify that on July 26 2023, I caused to be served a true and correct copy of the foregoing Motion for Relief from stay by electronic mail or by first class mail with postage prepaid on the following:

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